

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTJUAN L. MARTIN,)
)
Plaintiff,)
)
v.) Case No. CIV-13-1064-D
)
CITY OF OKLAHOMA CITY, et al.,)
)
Defendants.)

**DEFENDANT CITY'S OBJECTIONS TO
PLAINTIFF'S WITNESS AND EXHIBIT LIST**

COMES NOW a defendant, the City of Oklahoma City, and for its objections to

Plaintiff's Witness and Exhibit List states as follows:

Witnesses:

Witness	Objection
6. Jeff Trevillion, Jr.	Relevancy, FRE 401, 402, 403.
7. Any police personnel involved in the investigation of the citizens' complaints	Relevancy, FRE 401, 402, 403; Not sufficient identified
8. Any police personnel present at the scene of the subject incident.	Not sufficiently identified.
10. All of Plaintiff's medical providers	Not sufficiently identified.

Exhibits:

Exhibit	Objection
6. All notes and records related to the investigation of the citizen's complaint.	Not sufficiently identified; Relevancy, FRE 401, 402, 403.
8. Plaintiff's relevant medical records and reports.	Objection reserved pending production of the documents.
11. Related probable cause affidavit	Not sufficiently identified; Relevancy, FRE

	401, 402, 403
12. Published news articles related to bounty hunters operating in Oklahoma County	Relevancy, FRE 401, 402, 403; Hearsay, FRE 801, 802.
13. Relevant sections of Oklahoma City Municipal Code	Not sufficiently identified.
14. Statistical and related information regarding IWOP incidents, arrests, and prosecutions.	Relevancy, FRE 401, 402, 403; Authentication, 901

Respectfully submitted,

KENNETH JORDAN
Municipal Counselor

/s/ Jennifer M. Warren
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of November, 2014, I electronically transmitted the attached Objections to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing was sent to the following ECF registrants: Nathan H. Harper, info@nathanharper.com, Attorney for Plaintiff; and Susan Ann Knight, susanannknight@gmail.com, Attorney for Defendants Vetter, Sorrels, Mock and McClain.

/s/ Jennifer M. Warren
Assistant Municipal Counselor